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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,) CASE NO. 4:25-MJ-70862 MAG
17 Plaintiff,)
18 v.) STIPULATION AND ORDER
19 PEDRO GALEANO-LOBO,) EXCLUDING TIME FROM AUGUST 27, 2025, TO
20 Defendant.) SEPTEMBER 5, 2025
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29 This matter is currently set for a status conference before the Magistrate Court on August 27,
30 2025. The parties jointly request that this hearing be continued and reset for September 5, 2025. It is
31 hereby stipulated by and between counsel for the United States and counsel for the defendant Pedro
32 Galeano-Lobo, that time be excluded under the Speedy Trial Act from August 27, 2025, through
33 September 5, 2025. At the status conference held on August 12, 2025, the government and counsel for
34 the defendant agreed that time be excluded under the Speedy Trial Act and under Federal Rule of
35 Criminal Procedure 5.1, so that defense counsel could continue to prepare, including by reviewing
36 discovery and discussing resolution with the defendant. The government has now made an additional
37 production of discovery, and defense counsel will need additional time to review the materials and
38 confer with the defendant. For this reason and as further stated on the record at the status conference,

39 STIPULATION AND ORDER TO CONTINUE STATUS AND EXCLUDE TIME
40 Case No. 4:25-MJ-70862 MAG

1 the parties stipulate and agree that excluding time until September 5, 2025, will allow for the effective
2 preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that
3 the ends of justice are served by excluding the time from August 11, 2025, through September 22, 2025,
4 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant
5 in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

6 The parties further agree that good cause exists for extending the time limits for a preliminary
7 hearing under Federal Rule of Criminal Procedure 5.1 and for extending the 30-day time period for an
8 indictment under the Speedy Trial Act (based on the exclusions set forth above). *See* Fed. R. Crim. P.
9 5.1; 18 U.S.C. § 3161(b).

10 The undersigned Assistant United States Attorney certifies that she has obtained approval from
11 counsel for the defendant to file this stipulation and proposed order.

12 IT IS SO STIPULATED.

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14 IT IS SO STIPULATED.

15 DATED: August 13, 2025

16 _____
17 /s/
18 IVANA DJAK
19 Assistant United States Attorney

20 DATED: August 13, 2025

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22 /s/
23 MICHAEL LEVINE
24 Counsel for Defendant Pedro Galeano-Lobo

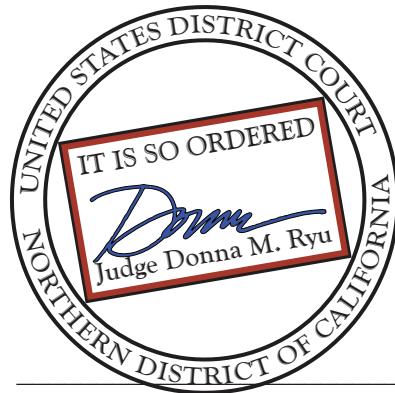
ORDER

2 Based upon the facts set forth in the stipulation of the parties and the representations made to the
3 Court on August 12, 2025 and for good cause shown, the Court finds that failing to exclude the time
4 from August 27, 2025, through September 5, 2025, would unreasonably deny defense counsel and the
5 defendant the reasonable time necessary for effective preparation, taking into account the exercise of
6 due diligence, and continuity of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that
7 the ends of justice served by excluding the time from August 27, 2025, through September 5, 2025, from
8 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a
9 speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time
10 from August 27, 2025, through September 5, 2025, shall be excluded from computation under the
11 Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

12 The Court also finds good cause for extending the time limits for a preliminary hearing under
13 Federal Rule of Criminal Procedure 5.1 and for extending the 30-day time period for an indictment
14 under the Speedy Trial Act (based on the exclusions set forth above). *See* Fed. R. Crim. P. 5.1; 18
15 U.S.C. § 3161(b).

16 The status hearing currently set for August 27, 2025, is hereby continued to September 5, 2025.
17 IT IS SO ORDERED.

19 | DATED: August 15, 2025



HON. DONNA M. RYU
Chief United States Magistrate Judge